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December 5, 2019

VIA FAX and ECF

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The Honorable George B. Daniels
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Daniels:

We write to ask the Court to extend by one week the time by which counsel for the *Ashton, Burnett, O'Neill* and *Federal Insurance* plaintiffs have to file written objections to the Report and Recommendation of Magistrate Judge Netburn issued on September 30, 2019 and /or to move to reconsider that decision. *See* ECF 5180.

This Court previously extended the time by which to file such motion to December 6, 2019, in light of the delay in scheduling a meet-and-confer with all of the relevant parties (due to work obligations and family health matters for some of the attorneys involved) until November 2019. *See* ECF 5272. Discussions among the parties continued in the weeks following the meet-and-confer before responding plaintiffs determined that it would be necessary to proceed with reconsideration and /or objections. Several different firms represent the responding plaintiffs, and given the recent holidays and scheduling issues, the responding plaintiffs have not yet been able to incorporate all comments and feedback from counsel. We therefore ask that this Court find good cause for this request and briefly extend the period of time by which written objections to the Report and Recommendation must be filed pursuant to 29 U.S.C. § 636(b)(1) and Fed.R.Civ.P. 72(b), or by which a Motion for Reconsideration must be filed from December 6, 2019 to December 13, 2019. This is the third request for an adjournment. The *Havlish* attorneys have advised us that they do not object to this request.

Respectfully,

Kreindler & Kreindler LLP

/s/ Megan W. Benett

cc: All counsel of record via ECF